

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

ALLEGIANCE COAL USA LIMITED, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10234 (CTG)

Jointly Administered

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE**

**PLEASE TAKE NOTICE** that **Indemnity National Insurance Company** (“Indemnity National”), by its attorneys **Saul Ewing LLP**, appears in this matter pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Sections 102(1), 342, and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and requests that all notices given or required to be given in these cases and all papers served or required to be served in these cases be given to and served upon:

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**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance shall not constitute a submission by Indemnity National to the jurisdiction or judicial authority of the Bankruptcy Court. This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive Indemnity National’s substantive or procedural rights,

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal EIN, are as follows: Allegiance Coal USA Limited (1324); New Elk Coal Holdings LLC (1314); New Elk Coal Company LLC (0615); and Black Warrior Minerals, Inc. (6486). The Debtors’ mailing address for purposes of these chapter 11 cases is 12250 Highway 12, Weston, CO 81091.

including: (i) the right to have final orders in non-core matters entered only after de novo review by a district court judge; (ii) the right to trial by jury in any proceedings so triable herein or in any case, controversy, or proceeding related hereto; (iii) the right to have the reference withdrawn by the United States District Court for this district in any matter subject to mandatory or discretionary withdrawal or the right to seek abstention in favor of any state court; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Indemnity National is or may be entitled to under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. Nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: March 2, 2023

**SAUL EWING LLP**

/s/ Lucian B. Murley

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